



"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
o. 843.216.9000 f. 843.216.9450

Robert T. Haefele
Licensed in DC, NJ, NY, PA, SC
direct: 843.216.9184
rhaefele@motleyrice.com

Via ECF

January 3, 2019

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**Re: In re Terrorist Attacks on September 11, 2001
Dkt. No. 03-md-1570**

Dear Judge Daniels and Magistrate Judge Netburn:

As required by the Court's July 10, 2018 Amended Order Approving Notice to Conform, Short Form Complaints, and Notices of Amendment (ECF No. 4045), we submit this letter on behalf of the plaintiffs in the following cases, who have filed Short Form Complaints against the Kingdom of Saudi Arabia, and write to request that the actions be made a part of this multi-district litigation (03-md-1570):

- *Arias, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-11582;
- *Agri, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-11619;
- *Barrera, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-11624;
- *Ando, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-11664;
- *Aepelbacher, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-12030;
- *Adam, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-12118;
- *Abreu, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-12318;
- *Parks, et al., v. Kingdom of Saudi Arabia*, civil action no. 18-cv-12322; and
- *Odland v. Kingdom of Saudi Arabia*, civil action no. 19-cv-26.

We have also filed Related Case Statements on the civil docket as to each case, explaining that the newly filed cases are each related to the multidistrict litigation captioned as *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD)(SN) ("MDL 1570").



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January 3, 2019

Page 2

Respectfully,

MOTLEY RICE LLC

By: /s/ Robert T. Haeefe
ROBERT T. HAEFELE

cc: All Counsel of Record via ECF